

**REMARKS/ARGUMENTS**

Favorable reconsideration of this application, as presently amended and in light of the following discussion, is respectfully requested.

Claims 1-21 are presently pending in this application, Claims 1, 18, 19 and 21 having been amended by the present amendment.

In the outstanding Office Action, Claims 1-4, 6, 10, 11 and 13-21 were rejected under 35 U.S.C. §102(b) as being anticipated by Grandmont et al. (U.S. Patent 5,254,435); and Claims 5 and 7-9 were indicated as allowable.

First, Applicants acknowledge with appreciation the courtesy of a personal interview granted to Applicants' representative on May 22, 2009. During the interview, the outstanding issues were discussed, and arguments in support of the claims were presented. Also, Applicants acknowledge with appreciation the indication that Claims 5 and 7-9 are allowable. However, these claims are presently maintained in dependent form, because Applicants believe that Claim 1, 18, 19 and 21 include allowable subject matter as discussed during the interview.

Based on the discussions held during the interview, Claim 1 has been amended to recite “*coating a liquid photoimageable ink on a carrier film to form a liquid photoimageable ink layer on said carrier film; drying said liquid photoimageable ink layer to form a photoimageable resist layer, thereby forming at least one photoimageable resist layer bearing film; laminating said photoimageable resist layer bearing film on at least one side of a substrate so as to bring the upper surface of said photoimageable resist layer into contact with said substrate; exposing said photoimageable resist layer to light through said carrier film to form an exposed resist layer; removing said carrier film from said exposed resist layer; developing said exposed resist layer to form a developed resist layer; and curing said developed resist layer to form a solder mask on said substrate*” (emphasis added in italic). As

discussed during the interview, Grandmont et al. only describes the dry resist 24 and the film 26 hot-laminated before roll-laminating onto a substrate or the film 26 directly roll-laminated onto a substrate covered with a layer of resist 24.<sup>1</sup> Thus, the subject matter recited in amended Claim 1 is clearly distinguishable from Grandmont et al., and Applicants respectfully request that the outstanding rejection based on Grandmont et al. be withdrawn.

Likewise, Claim 18, 19 and 21 have been amended to recite “means for coating a liquid photoimageable ink on a carrier film to form a liquid photoimageable ink layer on said carrier film; means for drying said liquid photoimageable ink layer to form a photoimageable resist layer, thereby forming at least one photoimageable resist layer bearing film ...,” “coating a liquid dielectric material ink on a carrier film to form a liquid dielectric material ink layer on said carrier film; drying said liquid dielectric material ink layer to form a dielectric material layer, thereby forming at least one dielectric layer bearing film ...,” and “a coater with which a liquid photoimageable ink is to be coated on a carrier film to form a liquid photoimageable ink layer on said carrier film; a dryer configured to dry said liquid photoimageable ink layer to form a photoimageable resist layer, thereby forming at least one photoimageable resist layer bearing film ...,” respectively. Thus, these claims are also believed to be distinguishable from Grandmont et al.

For the foregoing reasons, Claims 1, 18, 19 and 21 are believed to be allowable. Furthermore, since Claims 2-17 and 20 depend directly or indirectly from either Claim 1 or 19, substantially the same arguments set forth above also apply to these dependent claims. Hence, Claims 2-17 and 20 are believed to be allowable as well.

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<sup>1</sup> See, for example, Grandmont et al., column 5, lines 5-20.

In view of the amendments and in light of the discussions presented above, the present application is believed to be in condition for allowance. If, however, the Examiner disagrees with any of the foregoing amendments, the Examiner is invited to telephone the undersigned who will be happy to work in a joint effort to resolve any remaining issues and expedite the prosecution of this application. Applicants respectfully request an early and favorable action to that effect.

Respectfully submitted,

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